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ADMITTED TO N J, P A
a n d F E D E R A L
C O U R T S

February 1, 2024

Honorable Michael B. Kaplan
U.S. Bankruptcy Court
402 E. State Street
Trenton, NJ 08608

Re: Stephen A. Hester
Chapter 13 Bankruptcy Case No. 22-13265

Dear Judge Kaplan:

Kindly accept this letter in Lieu of a more formal brief in opposition to the Motion to Dismiss filed by Trustee, Albert Russo in the above referenced matter.

This petition was filed on April 19, 2022, to prevent the loss of Debtor's home due to foreclosure. Mr. Hester's main objective was and still is to remain in his home. Immediately after filing for bankruptcy protection, Mr. Hester started the modification process with his mortgage company. It was a long process which did not end with the results he was looking for. Mr. Hester was just recently denied the modification opportunity. Accordingly, a new plan has been filed placing all the mortgage arrears into the Plan.

In sum, the Debtor respectfully requests that the Trustee's Motion for Dismissal be denied as a modified plan has been filed with the Court correcting the Trustee's objection to the plan that was denied back in December.

Thank you for your courtesy and cooperation regarding this matter, and please do not hesitate to contact me should you have any questions.

Very truly yours,
/s/ Mark S. Cherry
Mark S. Cherry, Esquire

MSC/dm

Cc: Albert Russo, Trustee (via electronic filing only)